

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ARIANA GEORGE and RODNEY §
BOONE, Individually and as §
Representative of the Estate of AMARI §
BOONE, Deceased, §
§
Plaintiffs, §
§
vs. § CIVIL ACTION NO. 3-22-cv-1124-S
§
ACH CHILD and FAMILY SERVICES, §
et al. §
§
Defendants. §

**DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME
TO FILE A RESPONSIVE PLEADING**

Defendant Chaisity Frida-Caro submits this motion to request that her deadline to file an answer or other responsive pleading under Fed. R. Civ. P. 12, which is currently due on October 25, 2022, be extended to November 8, 2022. Defendant requests this extension as Defendant's counsel was in a lengthy trial which just concluded and counsel assisting left the firm.

This is Defendant's first request for such an extension. Plaintiff's counsel was unopposed to this request.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

QUINTAIROS, PRIETO, WOOD & BOYER, P.A.

By: /s/ Frank Alvarez
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**ATTORNEYS FOR DEFENDANT
CHAISITY FRIDA-CARO**

CERTIFICATE OF SERVICE

I certify that on October 25, 2022, this document was filed electronically via the Court's CM/ECF system, causing electronic service upon all counsel of record.

/s/ Frank Alvarez
FRANK ALVAREZ

CERTIFICATE OF CONFERENCE

I hereby certify that on October 25, 2022, I emailed counsel for the Plaintiff, Ashley D. Washington, to ask if she opposed the relief requested in this motion. Counsel stated that she is not opposed to this motion or the relief requested herein.

/s/ Frank Alvarez
FRANK ALVAREZ